

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

Plaintiff,

CASE NO.: 00 6032 CR ZLOCH

vs.

LIONEL J. HANNA

Florida Bar No.: 198242

Defendant.

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW the Defendant **LIONEL J. HANNA**, by and through his undersigned attorney, and files this his Motion for Continuance in this cause in support of which he states the following:

1. That Defendant is presently charged before this Honorable Court in a four count indictment with Possession with Intent to Distribute Cocaine, with Possession with Intent to Distribute Crack Cocaine, with Possession of a Firearm in Furtherance of a Drug Trafficking Offense, and with Possession of a Firearm by a Convicted Felon.
2. That trial is presently scheduled in this cause for the two-week trial calendar commencing May 22, 2000.
3. That Defendant was previously represented by the Federal Public Defender's Office whose Motion for Termination of Appointment as Counsel for Defendant was granted on April 17, 2000 after undersigned counsel was retained by Defendant and filed his Notice of Appearance in this cause on April 11, 2000.

4. That undersigned counsel received a copy of the Federal Public Defender's file, which included the Government's somewhat voluminous discovery, on or about April 21, 2000 and has been diligently examining same.

5. That the nature of said Discovery is such as to require further investigation on Defendant's behalf as well as the possible filing of pretrial motions such as a Motion to Suppress.

6. That, in sum, as a result of the nature of the charges filed against Defendant as well as the nature of the discovery in this cause, including at least one audio tape, undersigned counsel, who was only recently retained shall require a continuance in order to properly prepare for trial and afford Defendant adequate and effective assistance of counsel.

7. That undersigned counsel has spoken with the Assistant United States Attorney handling this cause, Donald Chase, who has authorized the undersigned to represent that the government has no objections to the Court granting his Motion to Continue this cause.

WHEREFORE, Defendant respectfully prays this Honorable Court continue this cause and reset it for trial at a later date.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on this 3rd day of May 2000 to Donald F. Chase, II, Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33394.



Don S. Cohn, Esq.
Don S. Cohn, P. A.
1504 NW 14th Street
Miami, Fl 33125
(305) 324-1649